

EXHIBIT A

JUDGE SWAIN

Case 1:15-cr-00066-LTS Document 9

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DOCUMENT

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FEB 03 2015

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ILYA PETROV,
a/k/a "Soldat," and
SUREN GADAYEV,

Defendants.

: INDICTMENT

: 15 Cr
: 15 CRIM 066

COUNT ONE

The Grand Jury charges:

1. From in or about November 2014, up to and including on or about January 25, 2015, in the Southern District of New York and elsewhere, ILYA PETROV, a/k/a "Soldat," and SUREN GADAYEV, the defendants, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Section 1951)

COUNT TWO

The Grand Jury further charges:

2. From in or about November 2014, up to and including on or about January 25, 2015, in the Southern District of New York and elsewhere, ILYA PETROV, a/k/a "Soldat," and SUREN GADAYEV, the defendants, knowingly and willfully did attempt to commit extortion, and did commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, PETROV and GADAYEV used threatened force to collect payment from an individual for a real estate deal in which PETROV and GADAYEV lost money.

(Title 18, United States Code, Sections 1951 and 2.)

FORFEITURE ALLEGATION

3. As the result of committing the offenses alleged in Counts One and Two of this Indictment, ILYA PETROV, a/k/a "Soldat," and SUREN GADAYEV, the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, which constitutes and is derived from proceeds traceable to the offenses.

Substitute Assets Provision

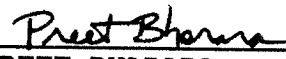
4. If any of the above-described forfeitable property, as a result of any act or omission of ILYA PETROV, a/k/a "Soldat," and SUREN GADAYEV, the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ILYA PETROV, a/k/a "Soldat," and
SUREN GADAYEV,
Defendants.

INDICTMENT

15 Cr. ____ ()

(21 U.S.C. § 853; 18 U.S.C. § 1951)

PREET BHARARA

United States Attorney.

A TRUE BILL

Foreperson.

- TRUE BILL & INDICTMENT

- MAG. JUDGE ELLIS

2/5/15 *[Signature]*

Wheeled to: JUDGE SWAIN

EXHIBIT B

**EXHIBIT “B” IS A
CD WHICH IS ATTACHED TO THE
JUDGE’S COURTESY COPY**